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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

18 | IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-md-05944-sc (N.D. Cal.)

MDL No. 1917

20 | This Document Relates to:

21 | ALL ACTIONS

**DECLARATION OF ERIC H. KIM IN
SUPPORT OF LG ELECTRONICS, INC.'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT ON DUE PROCESS GROUNDS**

[Notice of Motion for Partial Summary Judgment, Memorandum of Points and Authorities, Declaration of Laura K. Lin, and [Proposed] Order filed concurrently herewith]

25068289.1

1 I, Eric H. Kim, hereby declare:

2 1. I am over the age of eighteen, and am not a party to this action. I have personal
3 knowledge of the facts and matters stated herein and, if called, could and would testify
4 competently to them.

5 2. I am currently employed by LG Electronics, Inc. (“LGEI”) as a manager for LGE’s
6 Legal Division. I have held this position since 2012.

7 3. LGEI is a Korean corporation with its principal place of business at LG Twin
8 Towers 128, Yeoui-daero, Yeongdeungpo-gu, Seoul 150-721, Korea.

9 4. Prior to July 2001, LGEI manufactured cathode ray tubes (“CRTs”). LGEI sold
10 CRTs to LGEI’s CRT Product manufacturing facilities and other companies’ CRT Product
11 manufacturing facilities located outside of the United States. LGEI did not sell CRTs to
12 consumers because CRTs are not a standalone product.

13 5. At all times, LGEI’s CRT manufacturing facilities were located exclusively outside
14 of the United States.

15 6. Based on the information reasonably available to LGEI today, between March 1,
16 1995 and November 25, 2007, the Conspiracy Period alleged by the plaintiffs in this case, LGEI
17 had no sales of CRTs or CRT Products to customers located in Arizona, Florida, Illinois,
18 Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, Nevada, New York, New Mexico,
19 North Carolina, or Wisconsin.

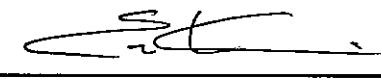
20 7. LGEI has no offices or other facilities in Arizona, California, Florida, Illinois,
21 Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, Nevada, New York, New Mexico,
22 North Carolina, or Wisconsin (collectively, the “Relevant States”).

23 8. LGEI does not own property in the Relevant States. LGEI has never acquired or
24 leased property in the Relevant States.

25 9. Based on the information reasonably available to LGEI today, no officer or director
26 of LGEI resides in the Relevant States or did so during the Relevant Period.

27 10. LGEI has never filed or been required to file taxes in the Relevant States.

1 I declare under penalty of perjury under the laws of California that the foregoing is true
2 and correct. Executed on the 7 day of November, 2014 in Seoul, S. Korea.

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